

## Koch, Kristine

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**From:** PETERSON Jenn L <PETERSON.Jenn@deq.state.or.us>  
**Sent:** Friday, July 11, 2014 11:24 AM  
**To:** Shephard, Burt  
**Cc:** Koch, Kristine  
**Subject:** RE: Portland Harbor PRG DDX Problem

Thanks Burt. This specific response is to the surface water RAO, but the arguments made in favor of dropping are the avian dietary / egg risk to DDX. Adding the sediment DDE PRG back into the table for piscivorous birds will correct the problem.

For aluminum, apparently EPA has not approved Oregon criteria, and this is on hold until the number is addressed nationally. However, in the interim for upland screening of GASCO groundwater, we are using the National Ambient Water Criteria (87 ug/L freshwater chronic, expressed as total for waters pH 6.5-9). NW Natural agreed to use this number in the risk assessment.

Is EPA not using NAWQ for aluminum for Portland Harbor until the NAWQ are revised to address the hardness issue? Since it is a risk driver for upland groundwater, upland soil, and was detected in elevated concentrations in in-water media (e.g. TZW, sediment) it would be good to coordinate on a number that EPA and DEQ agree on if possible. It would be great if you and Bob could work on this – I believe this would be much more effective than not assessing it due to concerns with the SLV. Let me know if I can assist in any way.

Thanks again for your time Wed.,

Jennifer

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**From:** Shephard, Burt [mailto:Shephard.Burt@epa.gov]  
**Sent:** Thursday, July 10, 2014 4:41 PM  
**To:** PETERSON Jenn L  
**Cc:** Koch, Kristine  
**Subject:** RE: Portland Harbor PRG DDX Problem

Jen,

(b) (6) she strongly agrees with us that just because something screens out in the in-water risk assessments doesn't automatically means that LWG can screen out or drop that same chemical from upland sites (or presumably source control, although we didn't specifically talk about source control). Its a wrong position for LWG or individual PRPs to take on multiple levels. Glad we're also on the same page regarding BSAF assumptions and that DDE doesn't drop out of the avian lines of evidence in the in-water BERA. I'm forwarding this to Kristine, hopefully its nothing more than a miscommunication about different chemical forms of DDX and what should and shouldn't drop out of the PRG table.

Regarding your aluminum concerns, I'm sure that between Bob Gensemer and I we could give you some free consulting on how to pull together an aluminum water quality TRV that would be appropriate to the upland and groundwater conditions, relative to the existing EPA water quality criteria for aluminum. Meant to ask you, is aluminum listed in Oregon's water quality standards? If so you could argue its an ARAR, since unlike EPA criteria, Oregon's water quality standards can be legally enforced.

Best regards,

Burt Shephard

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"Facts are stubborn things"  
- John Adams

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**From:** PETERSON Jenn L [<mailto:PETERSON.Jenn@deq.state.or.us>]  
**Sent:** Thursday, July 10, 2014 4:16 PM  
**To:** Shephard, Burt  
**Subject:** Portland Harbor PRG DDX Problem

Burt,

Please see the LWG's comments in the attached document: "2014-06-19 Att 1 COCs and PRGs Issue Statement. Pdf" regarding the DDX / DDE issue we discussed yesterday. I have cut out the DDX text in the file "DDX PRG Problem". The LWG is arguing that since DDX screens out they don't have to carry it forward, but as we discussed **DDE does not** and this PRG needs to be put back into the table.

Thanks for all the great discussion yesterday! Please call if you need help getting this resolved.

Jennifer

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**From:** Koch, Kristine [<mailto:Koch.Kristine@epa.gov>]  
**Sent:** Tuesday, July 08, 2014 9:30 AM  
**To:** LIVERMAN Alex; Allen, Elizabeth; Audie Huber ([audiehuber@ctuir.com](mailto:audiehuber@ctuir.com)); Bob Dexter; Brian Cunnigham ([cunningham@gorge.net](mailto:cunningham@gorge.net)); [callie@ridolfi.com](mailto:callie@ridolfi.com); Coffey, Scott; Conley, Alanna; Erin Madden ([erin.madden@gmail.com](mailto:erin.madden@gmail.com)); Fuentes, Rene; Gail Fricano ([gfricano@indecon.com](mailto:gfricano@indecon.com)); Genevieve Angle ([Genevieve.Angle@noaa.gov](mailto:Genevieve.Angle@noaa.gov)); Hagerman, Paul; Holly Partridge ([Holly.Partridge@grandronde.org](mailto:Holly.Partridge@grandronde.org)); JD Williams ([jd@williamsjohnsonlaw.com](mailto:jd@williamsjohnsonlaw.com)); PETERSON Jenn L; [Jeremy.Buck@fws.gov](mailto:Jeremy.Buck@fws.gov); Julie Weis ([jweis@hk-law.com](mailto:jweis@hk-law.com)); Matt Johnson ([matt@williamsjohnsonlaw.com](mailto:matt@williamsjohnsonlaw.com)); MCCLINCY Matt; [Michael.karnosh@grandronde.org](mailto:Michael.karnosh@grandronde.org); POULSEN Mike; Muza, Richard; [rdelvecchio@indecon.com](mailto:rdelvecchio@indecon.com) DelVecchio; [Robert.Neely@noaa.gov](mailto:Robert.Neely@noaa.gov); [rose@yakamafish-nsn.gov](mailto:rose@yakamafish-nsn.gov); Ryan Sudbury ([Ryan.Sudbury@grandronde.org](mailto:Ryan.Sudbury@grandronde.org)); Sheldrake, Sean; Shephard, Burt; Todd King ([KingTW@cdmsmith.com](mailto:KingTW@cdmsmith.com)); [tomd@ctsi.nsn.us](mailto:tomd@ctsi.nsn.us); GAINER Tom  
**Subject:** FW: LWG Comments on Revised FS Section 2

FYI..

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**From:** Jennifer Woronets [<mailto:jworonets@anchorqea.com>]

**Sent:** Thursday, June 19, 2014 2:46 PM

**To:** Koch, Kristine

**Cc:** Jennifer Woronets; Carl Stivers; Amanda Shellenberger; Jim McKenna ([jim.mckenna@verdantllc.com](mailto:jim.mckenna@verdantllc.com)); Patty Dost; Bob Wyatt; Sheldrake, Sean; Muza, Richard; King, Todd W.

**Subject:** LWG Comments on Revised FS Section 2

Kristine,

Please find attached a submittal that addresses those portions of Section 2 of the revised FS for which EPA has indicated discussions have concluded and on which it is commencing to draft the revised text. Portions of this submittal also address two outstanding EPA information requests from the FS "Draft Actions Items Lists" that is updated and sent to you on Friday's including:

- LWG to propose alternative method for calculating Dioxin/Furan TEQ PRG for RAO 2 (see Attachment 3, Section 5).
- LWG to propose alternative Mn ecological water toxicity value (see Attachment 1, Section 5).

We sincerely hope that all this information will be valuable to EPA as it undertakes the process of revising Section 2. Please contact Bob Wyatt if you want to discuss any issue we have raised here.

Thank you,  
Jen Woronets ☺  
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